

FLORENCE ROSTAMI LAW, LLC

THE GRAYBAR BUILDING

420 LEXINGTON AVENUE, SUITE 1402, NEW YORK, NEW YORK 10170

(212) 209-3962, Fax (917) 677-3697

www.rostamilaw.com

Florence Rostami+
Neal Haber

frostami@rostamilaw.com
nhaber@rostamilaw.com

+Also Admitted in CA and TX

via ecf

March 5, 2025

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 3/5/2025

The Honorable Gregory H. Woods
District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMORANDUM ENDORSED

***Re: Florence Rostami Law LLC v. Mitsuiya Industries, Co. Ltd.
Case No. 1:25-cv-1490-GHW***

Dear Judge Woods:

We are counsel for Florence Rostami Law LLC (“Plaintiff”). Pursuant to the Court’s Individual Rules, with counsel for Mitsuiya Industries, Co., Ltd. (“Defendant”), we submit this letter seeking to adjourn the initial pretrial conference set for March 14, 2025, at 3:00 p.m. and the corresponding deadline for submission of a proposed civil case management plan and scheduling order and joint status letter due on March 7, 2025. [DOC No. 19]

On February 21, 2025, this case was transferred from the United States District Court for the Eastern District of Michigan to this Court. On February 24, 2025, the Court issued a Notice of Initial Pretrial Conference order. [ECF No. 19] Pursuant to the Court’s Individual Rules, I notified lead counsel for Defendant, Samuel L. Estenson, in the Eastern District of Michigan proceedings, of the Court’s order.

In the Eastern District of Michigan, Defendant filed a motion to dismiss the complaint on personal jurisdiction grounds in lieu of a responsive pleading or for transfer of the matter to this Court, resulting in the case’s ensuing transferred. Defendant has not yet filed an answer or addressed any other grounds for dismissal it may assert, if any, other than as related to the previously described State of Michigan’s personal jurisdiction over Defendant. Counsel was admitted to this Court *pro hac vice* earlier today, and Defendant is still in the process of evaluating potential local counsel.

Given the procedural status of this case, the parties respectfully request that the Court approve the following deadlines in order to allow the parties to file their respective pleadings and

adjudicate any Rule 12 motions prior to engaging in the initial pretrial conference ordered by the Court:

- Defendant to answer or otherwise respond to Plaintiff's Complaint on or before March 19, 2025.
- Plaintiff to answer or respond to any counterclaim asserted in Defendant's responsive pleading, if an answer or response is required, on or before April 2, 2025. If Defendant files a motion to dismiss under Rule 12, Plaintiff will be provided 30 days to respond to such motion.
- Unless Defendant files a motion to dismiss under Rule 12, parties to submit a joint status letter and their proposed civil case management plan and scheduling order to the Court on or before April 18, 2025;
- Initial Pretrial Conference to be adjourned to a date and time as the Court determines.

Parties believe that the above schedule will facilitate the orderly adjudication of this matter. This is the first request for an extension or adjournment by either party for any reason, and all parties consent. Counsel remains available should the Court require additional information regarding this submission.

Respectfully submitted,


/s/Florence Rostami
Florence Rostami

cc: All counsel of record (via ECF)

Application granted in part and denied in part. The deadline for Defendant to answer or otherwise respond to the complaint is extended to March 19, 2025. The deadline for Plaintiff to answer or respond to any counterclaim asserted in Defendant's responsive pleading is April 2, 2025. The initial pretrial conference scheduled for March 14, 2025, is adjourned to April 28, 2025, at 3:00 p.m. The deadline for the parties to submit the joint letter and proposed case management plan outlined in the Court's February 21, 2025, order, Dkt. No. 19, is extended to April 21, 2025. Any application for leave to file a motion to dismiss must be made pursuant to the Court's Individual Rules of Practice in Civil Cases, specifically Rule 2(E). The Clerk of Court is directed to terminate the motion pending at Dkt. No. 27.

SO ORDERED.

Dated: March 5, 2025
New York, New York


GREGORY H. WOODS
United States District Judge